

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS; *et al.*,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House
Standing Committee on Redistricting; *et al.*,

Defendants.

Civil Action No. 23-CV-1057

NORTH CAROLINA STATE
CONFERENCE OF THE NAACP; *et al.*,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as
the President Pro Tempore of the North
Carolina Senate; *et al.*,

Defendants.

Civil Action No. 23-CV-1104

LEGISLATIVE DEFENDANTS' AMENDED PRETRIAL DISCLOSURES

Legislative Defendants, pursuant to Fed. R. Civ. P. 26(a)(3)(A), provide the following amended pretrial disclosures for the trial set to begin in the above-captioned matters on June 16, 2025:

I. WITNESSES LEGISLATIVE DEFENDANTS EXPECT OR MAY PRESENT AT TRIAL

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i), Legislative Defendants expect to present the following witnesses at trial:¹

1. Senator Ralph E. Hise, Jr.
2. Dr. John Alford
3. Dr. Michael Barber
4. Dr. Andrew Taylor
5. Dr. Sean Trende
6. Representative Pricey Harrison²
7. Senator Kandie Smith²

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i), Legislative Defendants may call the following witnesses:

1. Blake Springhetti¹
2. Stephen Mallinson

II. WITNESSES WHO LEGISLATIVE DEFENDANTS MAY PRESENT BY DEPOSITION

Legislative Defendants do not intend to present any witnesses by deposition at this time. However, Legislative Defendants reserve the right to submit deposition testimony in

¹ All of these witnesses can be contacted through counsel for Legislative Defendants.

² These witnesses can be contacted through their Counsel, Mr. Jonah Garson, of Parry Law, PLLC.

lieu of live testimony for any witness who becomes unavailable consistent with this Court's orders, or by further agreement of the parties.

III. EXHIBITS THAT DEFENDANTS EXPECT OR MAY OFFER AT TRIAL

An Amended Exhibit List is attached to these disclosures as Exhibit 1 and served in native format separately upon counsel for plaintiffs. This list is amended to note the removal of exhibits that the parties have agreed can be placed on the joint exhibit list,³ and to remove the exhibits pertaining to Dr. Hood, who Legislative Defendants are no longer calling as a witness. Legislative Defendants expect to use all of the listed expert materials, and may use the remaining listed materials.

Submitted this the 6th day of June, 2025.

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/s/ Phillip J. Strach

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³ In the event there is a removal of any of Legislative Defendants' exhibits from the Joint Exhibit List, Legislative Defendants reserve the right to amend their exhibit list to re-add the previously agreed upon joint exhibit.

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Counsel for Legislative Defendants
* Appeared via Special Notice

CERTIFICATE OF SERVICE

I, Phillip J. Strach, hereby certify that I have filed via ECF the foregoing document which will serve the same upon on all counsel of record in this action.

This the 6th day of June 2025.

**NELSON MULLINS RILEY &
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/s/ Phillip J. Strach
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